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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF LEONARD M. HEINE JR.,

SANDRA HEINE, individually, in her capacity as personal representative of the Estate of Leonard M. Heine Jr., and as trustee of the trust created under the Last Will and Testament of Leonard M. Heine Jr.,

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04478 (SMB)

LEONARD M. HEINE JR. CREDIT SHELTER TRUST,

MICHAEL HEINE,

NANCY ELLEN HEINE MOSKOWITZ,

THOMAS CHARLES HEINE,

CHRISTOPHER ALTMAN HEINE,

ROBERT G. HEINE,

MARJORIE HEINE BERGER,

LAUREN STACEY MOSKOWITZ,

ALEXANDRA DALE HEINE,

MORGAN HALEY HEINE, and

JEFFREY DAVID HEINE,

Defendants.

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: December 17, 2015.
- 2. Fact Discovery shall be completed by: May 2, 2017.
- 3. The Disclosure of Case-in-Chief Experts shall be due: July 31, 2017.
- 4. The Disclosure of Rebuttal Experts shall be due: August 30, 2017.

- 5. The Deadline for Completion of Expert Discovery shall be: September 29, 2017.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before October 6, 2017.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before October 20, 2017.
- 8. The Deadline for Conclusion of Mediation shall be: On or before February 16, 2018.

Dated: December 2, 2015 BAKER HOSTETLER LLP

By: s/ Keith R. Murphy 45 Rockefeller Plaza New York, New York 10111 Telephone: 212.589.4200 Facsimile: 212.589.4201

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